

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TIFFANY ROPER and HEIDI)	
EMMERLING, individually and on behalf of)	
all others similarly situated,)	
)	Case No. 1:23-cv-1836
Plaintiffs,)	
v.)	Judge: Hon. Lindsay Jenkins
)	
RISE INTERACTIVE MEDIA &)	
ANALYTICS, LLC,)	
)	
Defendant.)	

DECLARATION OF CAROLINE P. BARAZESH REGARDING CLASS NOTICE

I, Caroline P. Barazesh, pursuant to 28 U.S.C. § 1746, state as follows:

1. I am over the age of twenty-one. I am competent to give this declaration. This declaration is true and correct to the best of my knowledge, information and belief.

2. I am currently a Director for Analytics Consulting LLC (hereinafter “Analytics”), located at 18675 Lake Drive East, Chanhassen, Minnesota, 55317. In my capacity as Director, I am responsible for settlement administration in the above-captioned litigation.

3. Analytics was engaged to provide settlement administration services in the *Roper et al. v. Rise Interactive Media & Analytics, LLC* case. In this capacity, Analytics was charged with (a) establishing and maintaining a related settlement fund account; (b) establishing and maintaining a calendar of administrative deadlines and responsibilities; (c) sending CAFA notices; (d) emailing, printing and mailing the Notices of Class Action Settlement; (e) receiving and validating Requests for Exclusion, Objections and Claims submitted by Settlement Class Members; (f) processing and mailing payments to Settlement Class Members and Class Counsel; and (g) other tasks as the Parties mutually agree or the Court orders Analytics to perform.

4. On October 23, 2024, Analytics received the Court-approved Notice of Class Action and Proposed Settlement (“Class Notice”), postcard notice and Claim Form. The Class Notice advised Settlement Class Members of their right to request exclusion from the Settlement, object to the Settlement or file a Claim Form and the implications of each such action. The Class Notice advised Settlement Class Members of applicable deadlines and other events, including the Final Approval Hearing, and how they could obtain additional information.

5. On October 29, 2024, Analytics sent CAFA notices to the appropriate Government Officials as required by 28 U.S.C. § 1715.

6. On November 4, 2024, Counsel for Defendant provided Analytics with an Excel spreadsheet (“Class List”) containing Settlement Class Members’ names and last known mailing addresses for 54,377 Settlement Class Members.

7. The mailing addresses contained in the Class List were processed and updated utilizing the National Change of Address Database (“NCOA”) maintained by the U.S. Postal Service. The NCOA contains requested changes of address filed with the U.S. Postal Service. In the event that any individual had filed a U.S. Postal Service change of address request, the address listed with the NCOA would be utilized in connection with the mailing of the Notice Packets. Three duplicate records were identified and excluded from the mailing list.

8. This resulted in 54,374 Settlement Class Members.

9. Analytics researched the Class List to append email addresses. 44,318 email addresses were found.

10. Analytics established a case website at www.RiseSPISettlement.com, an email box at RiseSPISettlement@noticeadministrator.com and a toll-free phone number at (833) 594-4153 to provide assistance and information to Settlement Class Members. The website allowed Settlement Class

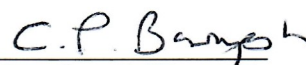
Members to file a Claim Form online. The website and phone number were included in the Class Notice, postcard notice and email.

11. On November 20, 2024, Analytics sent 44,318 notices by email and mailed the approved postcard notice to the most current mailing address of 10,058 Settlement Class Members via USPS First Class Mail. A copy of the email is attached hereto as Exhibit 1 and a copy of the postcard notice is attached as Exhibit 2.

12. Analytics' total costs for services in connection with the administration of this Settlement, including fees incurred and anticipated future costs for completion of the administration, are \$38,596. Administration fees up to \$26,648 will be paid from the Gross Fund. Administration fees above \$26,648 will be split equally between the Gross Fund and Defendant. Analytics' work in connection with this matter will continue with the mailing of postcard notices to Settlement Class Members with undeliverable emails, claims processing, issuance of settlement payments, and to do the necessary tax reporting for the settlement fund.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 25, 2024


Caroline P. Barazesh